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1803 '00 Jul 28 P2:33

December 10, 1999

Dr. Elizabeth Yetley Office of Special Nutritionals Food and Drug Administration 200 C Street SW Washington D.C. 20204

Dear Dr. Yetley:

We are offering for sale the following product Optio Ginkgo Biloba Extract, with the following Structure/Function claim: Promotes Healthy Circulation and Assists with Memory Function. The supporting side panel story is: Numerous clinical trials have shown Ginkgo Biloba supports healthy blood circulation to the brain and extremities. As an added benefit, healthy blood circulation may promote strong, memory function..

The FDA disclaimer will also appear on the label.

Sincerely,

Katie Ferren

Marketing Director

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